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CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

BY: *AV*

DEPUTY

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

July 2007 Grand Jury

10	UNITED STATES OF AMERICA,	)	Criminal Case No. <u>08CR0274-LAB</u>
11	Plaintiff,	)	
12	v.	)	<b><u>I N D I C T M E N T</u></b>
13	JORDAN ARNOLD (1),	)	<b><u>(Superseding)</u></b>
14	CHRISTOPHER BLACK (2),	)	Title 18, U.S.C.,
15	JESSICA KING (3),	)	Secs. 1591(a)(1), (a)(2) and
16	Defendants.	)	(b)(2) - Sex Trafficking of
17		)	Children; Title 18, U.S.C.,
		)	Sec. 2422(b) - Coercion and
		)	Enticement of Juvenile into
		)	Prostitution; Title 18, U.S.C.,
		)	Sec. 2 - Aiding and Abetting;
		)	Title 18, U.S.C., Sec. 371 -
		)	Conspiracy

The grand jury charges:

Count 1

CONSPIRACY TO ENGAGE IN SEX TRAFFICKING OF CHILDREN

[18 U.S.C. § 371]

**OBJECT OF THE CONSPIRACY**

1. From on or about August 1, 2007, until and including October 11, 2007, within the Southern District of California, and elsewhere, defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING, in and affecting interstate commerce, did knowingly conspire and agree with each other, and other persons known and unknown to the grand jury, to knowingly recruit, entice, harbor, transport, provide,

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1 and obtain by any means juveniles, and did benefit financially and by  
2 receiving a thing of value, from participation in a venture engaged  
3 in such acts, knowing that the juvenile had not attained the age of  
4 18 years and would be caused to engage in commercial sex acts; in  
5 violation of Title 18, United States Code, Section 1591.

6  
**METHODS AND MEANS**

7 2. From on or about a date unknown, but no later than August  
8 1, 2007, to and including October 11, 2007, defendants JORDAN ARNOLD,  
9 CHRISTOPHER BLACK and JESSICA KING recruited, persuaded, and  
10 transported juvenile females to perform acts of prostitution (exchange  
11 of sex acts for money) for the defendants' financial benefit.

12 3. The individuals hereinafter referred to as "the juveniles"  
13 include females identified as A. A., L. A., H. C., and K. W.

14 4. Defendants ARNOLD and BLACK recruited and enticed the  
15 juveniles to perform acts of prostitution, the proceeds from which the  
16 defendants intended to, and did, receive and keep.

17 5. Defendants ARNOLD, BLACK and KING instructed the juveniles  
18 how to solicit prostitution customers ("johns") for acts of  
19 prostitution ("dates"), including how to dress, how to pose for  
20 photographs used in internet ads soliciting "dates," what language to  
21 put in internet ads soliciting "dates," how to post internet ads  
22 soliciting "dates," what language to use on the telephone or in person  
23 to solicit "dates," how to perform sex acts, and how much money to  
24 charge in exchange for the performance of particular sex acts.

25 6. Defendants ARNOLD, BLACK and KING took digital photographs  
26 of the juveniles, as the juveniles wore lingerie and posed  
27 provocatively, which were subsequently saved onto computers and  
28 //

1 uploaded onto the internet and the Craigslist website to create ads  
2 soliciting "johns."

3 7. Defendants ARNOLD, BLACK, and KING posted, or instructed the  
4 juveniles to post, ads onto the Craigslist website to solicit "johns."

5 8. Defendants ARNOLD and BLACK provided telephones for the  
6 juveniles to receive calls from customers responding to Craigslist ads  
7 soliciting "johns," and for the juveniles to contact one of the  
8 defendants to pick up the juveniles from a hotel or elsewhere after  
9 completion of a date.

10 9. Defendants ARNOLD, BLACK and KING drove the juveniles to  
11 hotels and other locations within the Southern District of California  
12 to perform sex acts with "johns" solicited through Craigslist ads, and  
13 picked up the juveniles from the same locations after sex acts had  
14 been completed.

15 10. Defendants ARNOLD and BLACK collected from the juveniles  
16 proceeds obtained by the juveniles in exchange for completed sex acts  
17 performed in response to Craigslist ads.

18 **OVERT ACTS**

19 11. In furtherance of the conspiracy and to achieve the objects  
20 thereof, the defendants and their co-conspirators, known and unknown  
21 to the grand jury, committed and caused to be committed the following  
22 overt acts, among others, within the Southern District of California:

23 a. Between August 1, 2007 and August 15, 2007, Defendant  
24 ARNOLD recruited and enticed A. A. to work as a prostitute for his  
25 financial benefit.

26 b. Between August 15, 2007 and September 1, 2007,  
27 Defendant BLACK recruited and enticed L. A. to work as a prostitute  
28 for his financial benefit.

1 c. Between August 15, 2007 and September 1, 2007,  
2 Defendant ARNOLD instructed Defendant KING to teach A. A. and L. A.  
3 how to solicit "johns" and how to perform sex acts as a prostitute.

4 d. Between August 15, 2007 and September 1, 2007,  
5 Defendant KING taught A. A. and L. A. how to solicit "johns" and how  
6 to perform sex acts as a prostitute.

7 e. Between August 15, 2007 and October 11, 2007, Defendant  
8 BLACK instructed L. A. that her picture and phone number would be on  
9 the internet and that she would receive calls soliciting sex as well  
10 as how much money to charge for acts of prostitution.

11 f. Between August 15, 2007 and September 1, 2007,  
12 Defendant KING used Defendant ARNOLD's mobile telephone to take  
13 photographs of A. A. and L. A. in lingerie and provocative poses for  
14 ads which would be posted on the Craigslist website to solicit  
15 "johns."

16 g. Between August 15, 2007 and September 15, 2007,  
17 Defendant BLACK took photographs of L. A. at his apartment, while she  
18 was in lingerie and provocative poses for an ad which would be posted  
19 on the Craigslist website to solicit "johns."

20 h. Between August 15, 2007 and October 11, 2007,  
21 Defendants ARNOLD and BLACK provided access to their computers to  
22 A. A. with instructions that A. A. was to post Craigslist ads  
23 depicting herself to solicit "johns."

24 i. Between August 15, 2007 and October 11, 2007, Defendant  
25 BLACK used his computer and other computers to post Craigslist ads  
26 depicting L. A. to solicit "johns" for L. A.

27 j. Between August 1, 2007 and October 11, 2007, Defendant  
28 ARNOLD gave a mobile telephone to A. A. to use to receive calls from

1 "johns" in response to the Craigslist ads and to communicate with  
2 Defendant ARNOLD.

3 k. Between August 15, 2007 and October 11, 2007, Defendant  
4 BLACK gave a mobile telephone to L. A. to use to receive calls from  
5 "johns" in response to the Craigslist ads and to communicate with  
6 Defendant BLACK.

7 l. Between August 1, 2007 and October 11, 2007, Defendant  
8 ARNOLD directed A. A. to make arrangements by telephone to meet  
9 "johns" at various hotels in the Mission Valley or Sports Arena areas  
10 of San Diego.

11 m. Between August 1, 2007 and October 11, 2007, Defendants  
12 ARNOLD, BLACK and KING drove A. A. to hotels where they knew  
13 A. A. would perform acts of prostitution arranged in response to ads  
14 depicting her and posted on Craigslist.

15 n. Between August 15, 2007 and October 11, 2007,  
16 Defendants ARNOLD and BLACK drove L. A. to hotels where they knew  
17 L. A. would perform acts of prostitution arranged in response to ads  
18 depicting her and posted on Craigslist.

19 o. Between August 1, 2007 and October 11, 2007, Defendant  
20 ARNOLD picked up A. A. from various locations in San Diego after she  
21 had completed acts of prostitution.

22 p. Between August 15, 2007 and October 11, 2007, Defendant  
23 BLACK picked up L. A. from various locations in San Diego after she  
24 had completed acts of prostitution.

25 q. Between August 1, 2007 and October 11, 2007, Defendant  
26 ARNOLD collected from A. A. the proceeds she received in exchange for  
27 acts of prostitution.

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1           r.     Between August 15, 2007 and October 11, 2007, Defendant  
2 BLACK collected from L. A. the proceeds she received in exchange for  
3 acts of prostitution.

4           s.     On September 13, 2007, Defendant KING posted an ad  
5 depicting A. A. onto the Craigslist website to solicit "johns."

6           t.     On or about September 14, 2007 and September 15, 2007,  
7 Defendant ARNOLD recruited and enticed H. C. and K. W. to work as  
8 prostitutes for his financial benefit.

9           u.     On or about September 15, 2007, at a hotel in the  
10 Mission Valley area of San Diego, Defendant ARNOLD used the camera in  
11 his mobile telephone to take photographs of H. C. and K. W. while they  
12 were dressed in lingerie and in provocative poses, which were  
13 subsequently used in ads posted on Craigslist to solicit "johns."

14          v.     On or about September 18, 2007, Defendant ARNOLD  
15 instructed A. A. to teach H. C. and K. W. how to post ads on Craiglist  
16 and how to solicit "dates" for prostitution.

17          w.     Between September 14, 2007 and October 11, 2007,  
18 Defendant ARNOLD instructed K. W. that he would break her jaw if she  
19 reported him to the police, talked back to Defendant ARNOLD, or did  
20 not do as he instructed her.

21          x.     Between September 14, 2007 and October 11, 2007,  
22 Defendant ARNOLD instructed H. C. to make arrangements by telephone  
23 to meet "johns" at various hotels in the Mission Valley or Sports  
24 Arena areas of San Diego, arranged in response to ads depicting her  
25 and posted on Craigslist.

26     //

27     //

28     //

1 y. Between September 14, 2007 and October 11, 2007,  
2 Defendant ARNOLD gave a mobile telephone to H.C. to use to receive  
3 calls from "johns" in response to the Craigslist ads, and to  
4 communicate with Defendant ARNOLD.

5 z. Between September 14, 2007 and October 11, 2007,  
6 Defendant ARNOLD drove H.C. to hotels where he knew H. C. would  
7 perform acts of prostitution arranged in response to ads depicting her  
8 and posted on Craigslist.

9 aa. Between September 14, 2007 and October 11, 2007,  
10 Defendant ARNOLD picked up H. C. from various locations in San Diego  
11 after H. C. completed acts of prostitution.

12 bb. Between September 14, 2007 and October 11, 2007,  
13 Defendant ARNOLD collected from H. C. the proceeds H. C. received in  
14 exchange for acts of prostitution.

15 cc. On October 6, 2007, Defendants ARNOLD and BLACK rented  
16 rooms at a hotel in the Mission Valley area of San Diego for use by  
17 A. A. and L. A. to perform acts of prostitution with "johns" solicited  
18 through Craigslist ads depicting A. A. and L. A., and posted on the  
19 same date.

20 dd. On October 7, 2007, Defendants ARNOLD and BLACK rented  
21 a room at a hotel in the Mission Valley area of San Diego for use by  
22 A. A., L. A. and H. C. to perform acts of prostitution with "johns"  
23 solicited through Craigslist ads depicting A. A., L. A. and H. C., and  
24 posted on the same date.

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1 ee. On October 11, 2007, Defendant ARNOLD drove H. C. to  
2 a hotel in the San Diego area to perform an act of prostitution with  
3 a date solicited through a Craigslist ad depicting H. C. and posted  
4 on the same date.

5 All in violation of Title 18, United States Code, Section 371.

6 Count 2

7 CONSPIRACY TO COERCE AND ENTICE JUVENILES INTO PROSTITUTION

8 [18 U.S.C. § 371]

9 **OBJECT OF THE CONSPIRACY**

10 12. From on or about August 1, 2007, until and including  
11 October 11, 2007, within the Southern District of California, and  
12 elsewhere, defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA  
13 KING, knowingly conspired and agreed with each other, and other  
14 persons known and unknown to the grand jury, to use the mail and any  
15 facility and means of interstate or foreign commerce, to knowingly  
16 persuade, induce, entice, and coerce an individual who had not  
17 attained the age of 18 years, to engage in prostitution and any sexual  
18 activity for which any person can be charged with a criminal offense;  
19 in violation of Title 18, United States Code, Sections 2422(b).

20 **METHODS AND MEANS**

21 13. The Government incorporates by reference Paragraphs 2  
22 through 10.

23 **OVERT ACTS**

24 14. The grand jury hereby repeats and realleges Paragraph 11 as  
25 fully set forth herein.

26 All in violation of Title 18, United States Code, Section 371.

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Count 3

1  
2 From on or about August 1, 2007, until and including October 11,  
3 2007, within the Southern District of California, defendants JORDAN  
4 ARNOLD, CHRISTOPHER BLACK and JESSICA KING, in and affecting  
5 interstate commerce, did knowingly recruit, entice, harbor, transport,  
6 provide and obtain by any means A. A., (a juvenile), and did benefit  
7 financially and by receiving a thing of value, from participation in  
8 a venture engaged in such acts, knowing that A. A. had not attained  
9 the age of 18 years and would be caused to engage in commercial sex  
10 acts; all in violation of Title 18, United States Code, Sections  
11 1591(a)(1), (a)(2), (b)(2), and 2.

Count 4

12  
13 From on or about August 1, 2007, until and including  
14 October 11, 2007, within the Southern District of California,  
15 defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING, using  
16 the mail and any facility and means of interstate or foreign commerce,  
17 did knowingly persuade, induce, entice, and coerce an individual who  
18 had not attained the age of 18 years, namely A. A., (a juvenile), to  
19 engage in prostitution and any sexual activity for which any person  
20 can be charged with a criminal offense; all in violation of Title 18,  
21 United States Code, Sections 2422(b) and 2.

Count 5

22  
23 From on or about August 1, 2007, until and including  
24 October 11, 2007, within the Southern District of California,  
25 defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING, in and  
26 affecting interstate commerce, did knowingly recruit, entice, harbor,  
27 transport, provide and obtain by any means L. A., (a juvenile), and  
28 did benefit financially and by receiving a thing of value, from

1 participation in a venture engaged in such acts, knowing that L. A.  
2 had not attained the age of 18 years and would be caused to engage in  
3 commercial sex acts; all in violation of Title 18, United States Code,  
4 Sections 1591(a)(1), (a)(2), (b)(2), and 2.

5 Count 6

6 From on or about August 1, 2007, until and including  
7 October 11, 2007, within the Southern District of California,  
8 defendants JORDAN ARNOLD, CHRISTOPHER BLACK and JESSICA KING, using  
9 the mail and any facility and means of interstate or foreign commerce,  
10 did knowingly persuade, induce, entice, and coerce an individual who  
11 had not attained the age of 18 years, namely L. A., (a juvenile), to  
12 engage in prostitution and any sexual activity for which any person  
13 can be charged with a criminal offense; all in violation of Title 18,  
14 United States Code, Sections 2422(b) and 2.

15 Count 7

16 From on or about August 1, 2007, until and including  
17 October 11, 2007, within the Southern District of California,  
18 defendant JORDAN ARNOLD, in and affecting interstate commerce, did  
19 knowingly recruit, entice, harbor, transport, provide and obtain by  
20 any means H. C., (a juvenile), and did benefit financially and by  
21 receiving a thing of value, from participation in a venture engaged  
22 in such acts, knowing that H. C. had not attained the age of 18 years  
23 and would be caused to engage in commercial sex acts; all in violation  
24 of Title 18, United States Code, Sections 1591(a)(1), (a)(2),  
25 and (b)(2).

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27 //

28 //

Count 8

1  
2 From on or about August 1, 2007, until and including  
3 October 11, 2007, within the Southern District of California,  
4 defendant JORDAN ARNOLD, using the mail and any facility and means of  
5 interstate or foreign commerce, did knowingly persuade, induce,  
6 entice, and coerce an individual who had not attained the age of 18  
7 years, namely H. C., (a juvenile), to engage in prostitution and any  
8 sexual activity for which any person can be charged with a criminal  
9 offense; all in violation of Title 18, United States Code,  
10 Section 2422(b).

Count 9

11  
12 From on or about August 1, 2007, until and including  
13 October 11, 2007, within the Southern District of California,  
14 defendant JORDAN ARNOLD, in and affecting interstate commerce, did  
15 knowingly recruit, entice, harbor, transport, provide and obtain by  
16 any means K. W., (a juvenile), and did benefit financially and by  
17 receiving a thing of value, from participation in a venture engaged  
18 in such acts, knowing that K. W. had not attained the age of 18 years  
19 and would be caused to engage in commercial sex acts; all in violation  
20 of Title 18, United States Code, Sections 1591(a)(1), (a)(2),  
21 and (b)(2).

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Count 10

From on or about August 1, 2007, until and including October 11, 2007, within the Southern District of California, defendant JORDAN ARNOLD, using the mail and any facility and means of interstate or foreign commerce, did knowingly persuade, induce, entice, and coerce an individual who had not attained the age of 18 years, namely K. W., (a juvenile), to engage in prostitution and any sexual activity for which any person can be charged with a criminal offense; all in violation of Title 18, United States Code, Section 2422(b).

DATED: May 23, 2008.

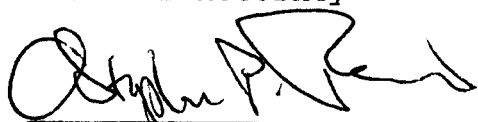
A TRUE BILL:



Foreperson

KAREN P. HEWITT  
United States Attorney

By:



CHRISTOPHER P. TENORIO  
Assistant U.S. Attorney